OFFICIAL PLE ILLINOIS COMMERCE COMMISSION

STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION



Ameren Energy Marketing Company

00-0486

Application for Certificate of Service Authority : under Section 16-115 of the Public Utilities Act. :

AEMC'S VERIFIED RESPONSE TO REQUEST FOR INFORMATION

Ameren Energy Marketing Company ("AEMC") submits this verified response to the Hearing Examiner's July 17 ruling requesting additional information regarding AMEC's application in this matter.

1. 83 III. Adm. Code 451.30 -- Proof of Publication

Proof of publication as required by Section 451.30(a) of 83 III. Adm. Code 451 will be provided under separate cover when received from the publisher.

2. 83 III. Adm. Code 451.120 -- Technical Qualifications

(a) The July 12 Ruling noted that 83 Illinois Administrative Code 451.120(b) requires AEMC to show that it has staff with at least 2 years demonstrated electric sales experience and 2 years operational experience. The Ruling requested that AEMC identify the specific individuals that it believes meets the requirements relating to operational experience, and to describe the operational experience which demonstrates that the individuals identified meet these requirements.

Response: Andrew M. Serri, who serves as Vice President of Sales and Marketing of AEMC and was identified in response to the required qualification under 83 LL. Adm.

Code 451.120 in Attachment E, has both sales experience and operational experience. In addition to the experience described in Attachment E, Mr. Serri also has System Control experience, including at least 5 years as a system dispatcher and two years as a System Coordinator, responsible for the operation of the AEP System.

(b) The Ruling also noted that 83 Illinois Administrative Code 451.120(b) also requires AEMC to provide, or arrange to provide, a scheduling facility with 24 hour staffed operation for coordination with control centers of scheduling changes, reserve implementation, curtailment orders, and interruption plan implementation, and requested that AEMC provide information as to the status of Applicant's compliance with this requirement.

Response: Ameren Energy provides, as agent for AEMC, scheduling personnel and systems, including a real-time scheduling desk that is staffed 24 hours a day and is responsible for responding to the real-time needs of AEMC customers, including scheduling changes, curtailment order and interruption plan implementation. The 24 hour telephone number for the real-time scheduling desk is 314-613-9500.

3. 83 III. Adm. Code 451, Subpart F -- Single Billing

The Ruling noted that AEMC intends to provide single billing services pursuant to Subpart F of Part 451. Section 451.500 provides that the requirements of Subpart F are in addition to the requirements of Subpart A. To demonstrate its financial qualifications under Subpart F, an applicant may demonstrate creditworthiness in one of four ways. The Ruling requested that AEMC indicate which of the four ways in Section 451.510 is

being used by the Applicant to demonstrate its financial qualifications under Subpart F, and provide the necessary documentation in support thereof, or, in the alternative, indicate specifically where such information is contained in Attachment D.

Response: AEMC believes that the money pool agreement provided in Attachment provides with an adequate guarantee of a source of funds. The credit rating report of Ameren substantiates the quality of the source of funds.

4. Section 16-115(d)(5) of the Act -- Reciprocity

(a) The Ruling noted that, at pages 13 to 14 of Attachment C to the Application, AEMC discusses the issue of comparable delivery services and the electric operations of AmerenCIPS and AmerenUE. The Ruling requested that AEMC indicate (1) the number of AmerenCIPS retail customers located in Illinois and (2) the total number of AmerenCIPS retail customers. Also indicate the number of AmerenUE retail customers located in (1) Illinois and (2) Missouri as well as the total number of AmerenUE retail customers. Please provide this information as of December 31, 1999.

Response: As of December 31, 1999, AmerenCIPS had 325,616 retail electric customers, all of whom were located in Illinois. As of the same date, AmerenUE had 1,171,000 retail customers, of whom 62,000 were located in Illinois and 1,109,000 were located in Missouri.

(b) The Ruling requested that, for the calendar year 1999, AEMC state AmerenUE's total electric operating revenues, and, for the same period, also separately state AmerenUE's electric operating revenues which are based on rates regulated by (1)

the Illinois Commerce Commission, (2) the Missouri Public Service Commission, and (3) the Federal Energy Regulatory Commission, respectively.

Response: AmerenUE's total 1999 electric operating revenues were \$,2,275,000,000, of which \$145,000,000 were attributable to Illinois, \$_1,901,000,000 were attributable to Missouri, and \$230,000,000 were attributable to FERC jurisdictional sales.

(c) The Ruling also requested, for the calendar year 1999, AmerenCIPS' total electric operating revenues. For the same period, also separately state AmerenCIPS' electric operating revenues which are based on rates regulated by (1) the Illinois Commerce Commission, (2) the Missouri Public Service Commission, if any, and (3) the Federal Energy Regulatory Commission, respectively.

Response: AmerenCIPS' total 1999 electric operating revenues were \$743,812,439, of which \$576,567,618 were attributable to Illinois, \$0 were attributable to Missouri, and \$167,244,821 were attributable to FERC jurisdictional sales.

(d) The Ruling also noted that, on page 4 of the Application, paragraph 15, under the heading "Reciprocity" the entity Electric Energy, Inc. ("EEInc") is listed. The Ruling asked that AEMC: provide the address of this entity; describe the business operations of EEInc; indicate if EEI is engaged in electric retail sales or purchases in the North American continent; and indicate if EEI owns or controls facilities, for public use, for the transmission or distribution of electricity to end-users within a defined geographic area.

Response: EEInc. is an Illinois corporation, located at 2100 Portland Road, Joppa, IL 62953. All of the outstanding shares of EEInc are owned by AmerenCIPS, AmerenUE,

Illinois Power Company and Kentucky Utilities Company (the "Sponsors"). EEInc. makes wholesale sales to the U.S. Department of Energy, to its Sponsors, and to other unaffiliated entities. EEInc. also wholly owns Midwest Electric Power, Inc., that will own and/or operate generation to be installed at EEInc.'s Joppa, Il site.

EEInc. owns and controls transmission and distribution facilities for the sole purpose of transmitting and distributing energy and capacity to the Department of Energy's gaseous diffusion plant, located in Paducah, Kentucky and for transmitting energy and capacity to the sponsoring companies of EEInc. EEInc. does not serve any retail customers in Illinois, nor does it have a statutory right or obligation to transmit or distribute electricity to end-users within a geographic area, outside of its current supply contract to serve the Department of Energy.

(e) The Ruling requested that, with regard to EEInc, AEMC provide an explanation of how Applicant complies with Section 16-115(d)(5) of the Act.

Response: EEInc does not control a retail service territory.

Respectfully submitted

Ameren Energy Marketing Company

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AFFIDAVIT

Christopher W. Flynn, an attorney for AEMC, being first duly sworn, states that he has reviewed the information provided in the foregoing Responses, that he is familiar with that information and that the is true and correct to the best of knowledge.

Christopher W. Flynn

Subscribed and sworn to before me this 27th day of

July, 2000

Notary Public

OFFICIAL SEAL KAREN E HOBIK

NOTARY PUBLIC, STATE OF ILLINOIS MY COMMISSION EXPIRES: 12/09/00